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JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

GLORIA J. JEFF  
DIRECTOR

September 15, 2004

File: 35-48-6-0

U.S. Department of Transportation  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590

DEPT OF TRANSPORTATION  
DOCKETS  
2004 SEP 29 PM 2:59

RE: FHWA Docket No. FHWA -2003-15149 -15

Dear Sir/Madam:

The Michigan Department of Transportation (MDOT) supports the concept of minimum sign retroreflectivity and concurs with comment on the language in the July 30, 2004, Federal Register.

Section 2A.09 Minimum Retroreflectivity describes the different assessment or measurement methods to use to maintain minimum sign retroreflectivity. However, in both the Federal Register and on Page I-3, Compliance Dates, the language used indicates a compliance date for the replacement of signs themselves. This is a conflict with the proposed intent of the proposed change that must be addressed.

MDOT recommends the following language be added to the compliance date information on page I-3.

“One or more of the assessments or management methods should be in place within the time period specified.”

In addition, although minimum retroreflectivity values are not available for blue signs, emphasis needs to be placed on maintaining retroreflectivity for emergency signs such as the D9-2, D9-13, and D9-13a, b, c. MDOT recommends the following language be added to Section 2A.09, Option D.

“except the Hospital and Emergency Medical Care, and Ambulance Station sign (D19-2, D9-13a, b, c). The measured sign retroreflectivity method cannot be used for D9-2, D9-13a, b, c signs until retroreflectivity levels have been implemented by FHWA. Other management or assessment methods should be used for the D9-2 and D9-13a, b, c signs.”

Thank you for the opportunity to comment on this Proposed Rule.

Sincerely,

A handwritten signature in black ink that reads "Mark W. Bott". The signature is written in a cursive style with a large, stylized "M" and "B".

Mark W. Bott  
Traffic Operations Manager

MWB:gb

cc: J. Friend  
J. Culp  
A. Uzcategui  
TSAD